

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RED TREE INVESTMENTS, LLC,

Plaintiff,

- against -

PETROLEOS DE VENEZUELA, S.A. and PDVSA
PETROLEO, S.A.,

Defendants.

**NOTICE OF PLAINTIFF'S
MOTION TO LIFT THE
LITIGATION STAY**

Docket No. 1:19-CV-02519
(related to 1:19-CV-02523)

PLEASE TAKE NOTICE that upon the accompanying Declaration of Stephen A. Broome and for the reasons set forth in the Memorandum of Law in Support of Plaintiff's Motion to Lift the Stay, plaintiff Red Tree Investments, LLC ("Red Tree"), by and through their undersigned counsel, shall move this Court, before the Honorable Alison J. Nathan, at Courtroom 906 of the United States Courthouse, 40 Foley Square, New York, New York, at a date and time to be determined by the Court, for an order lifting the litigation stay entered by the Court on May 3, 2019, directing Defendants to respond to Red Tree's Motion for Summary

Judgment within 20 days, and establishing a schedule for full briefing of the Motion for Summary Judgment, and for such other and further relief as this Court deems just and proper.

DATED: New York, New York
August 5, 2019

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Stephen A. Broome

Stephen A. Broome
Susheel Kirpalani
Victor Noskov
Anna Deknatel
51 Madison Avenue, 22nd Floor
New York, New York 10010-1601
(212) 849-7000

Daniel Salinas-Serrano (*pro hac vice*)
1300 I Street, N.W.
Suite 900
Washington, D.C. 20005
Tel: 202-538-8132

Attorneys for Red Tree Investments, LLC